

REMARKS/ARGUMENTS

Reconsideration of the application as amended is respectfully requested.

Status of Claims

Claims 1-8 are pending, with Claim 1 being the only independent claim. Claims 1-8 have been amended.

Overview of the Office Action

Claims 1-8 stand rejected under 35 U.S.C. § 112, second paragraph, because of the last four lines of Claim 1 and the expression "this feature being not limiting the scope of the invention" in Claim 2.

Claims 1-6 and 8 stand rejected under 35 U.S.C. § 102(b) as anticipated by published U.S. Patent Application, Publication No. US 2002/0117265 (*Mayet '265*), or Publication No. US 2002/0117251 (*Mayet '251*).

Claims 1 and 3-8 stand rejected under 35 U.S.C. § 102(b) as anticipated by published U.S. Patent Application, Publication No. US 2001/0023736 (*Mayet '736*).

Amendment Addressing Section 112 and Formalities

Claim 1 has been amended to more clearly define the relationship between the support and the toroidal form. Claim 2 has been amended to eliminate the expression "this feature being not limiting the scope of the invention."

In view of these changes, withdrawal of the rejection of Claims 1-8 under § 112, second paragraph, is respectfully requested.

Summary of Subject Matter Disclosed in the Specification

The following descriptive details are based on the specification. They are provided only for the convenience of the Examiner as part of the discussion presented herein, and are not intended to argue limitations which are unclaimed.

A device is disclosed for fabricating a tire reinforcement made from a cord on a toroidal form, i.e. core 1. The device shown in Fig. 1 comprises an actuation mechanism employing arm 131. A cord laying element 16 is mounted on the lower end of the arm 131. Arm 131 rotates in a cyclic, back and forth movement to lay the cord on core 1. The arm is carried on a support 130, which is slidably mounted on a rail 132 that allows a translational, back and forth movement of the support 130 in a plane parallel to the rotation axis of the toroidal form. The translational movement has a directional component parallel to the rotation axis of the toroidal form. See Fig. 1. Translational movement of support 130 is synchronized with rotational movement of arm 131 to produce the overall movement shown in Fig. 2.

The motion of support 130 renders the device suitable for fabricating a tire reinforcement on a wide toroidal form. Compared with prior art devices suitable for fabricating a tire reinforcement on a wide toroidal form, this device is relatively simple, light and compact. See paragraph [0005].

Descriptive Summary of the Prior Art

Mayet '265

Mayet '265 relates to a device for fabricating a tire reinforcement made from a cord on a toroidal form. In one embodiment of *Mayet '265*, the device comprises an actuation mechanism 3^{1a} that employs a vertically positioned, rotatable first auxiliary arm 3D^{1a}, and a horizontally positioned main arm 31^{1a} which is attached to the first auxiliary arm 3D^{1a}. A second auxiliary

arm 32^{1a} is suspended from the main arm 31^{1a} and supports a cord laying element 6^{1a} at its lower end. The first auxiliary arm 3D^{1a} is supported by a support 30^{1a}. *See Fig. 1.*

The Examiner contends that "the movement capability of the support along the direction marked "P"... is along a direction that would be parallel to a tangent plane as claimed." Claim 1 has been amended herein to recite that the movement of the actuation mechanism is "in a plane parallel to said rotation axis of said toroidal form, and said movement having a component directed parallel to said rotation axis of said toroidal form."

Mayet '265 does not disclose or suggest this claimed feature. As depicted, direction "P" is perpendicular to the rotation axis of the toroidal form and, therefore, cannot have "a component directed parallel" thereto.

Mayet '251

Mayet '251 also relates to a device for fabricating a tire reinforcement made from a cord on a toroidal form. The device has an actuation mechanism 3 that employs a vertically positioned, rotatable first arm 3D, and a second arm 31 which is attached to the first arm 3D. A cord laying element 6 is provided at the lower end of the second arm 31. The first arm 3D is borne by a support 30. *See Fig. 1.*

Mayet '251 also shows the same direction "P" disclosed in *Mayet '265*.

Mayet '736

Mayet '736 also relates to a device for fabricating a tire reinforcement made from a cord on a toroidal form. In one embodiment of *Mayet '736*, the device has an actuation mechanism that employs three auxiliary arms. First and second auxiliary arms 31^{1a}, 34^{1a} are parallel to and spaced from each other. In addition, each of the first and second auxiliary arms 31^{1a}, 34^{1a} has one end rotatably connected to a support 30^{1a}, and the other end rotatably connected to a main arm 32^{1a}. The main arm 32^{1a}, in turn, is rotatably connected to one end of a third auxiliary arm

33^{1a}. A cord laying element 6^{1a} is mounted on the other end of the third auxiliary arm 33^{1a}. See Fig. 1.

Mayet '736 also shows the same direction "P" disclosed in *Mayet '265*.

Arguments

Claim 1

Applicant respectfully submits that Claim 1, as amended, is not anticipated by *Mayet '265*, *Mayet '251* or *Mayet '736* because none of the applied references discloses, either expressly or inherently, each and every element as set forth in Claim 1.

In particular, none of the applied references discloses or suggests that the support be moved in a plane that is essentially parallel to the rotation axis of the toroidal form, and that the movement has a component directed parallel to the rotation axis of the toroidal form. In each of *Mayet '265*, *Mayet '251* and *Mayet '736*, the double arrow "P" is in a direction that is perpendicular to the rotation axis of the toroidal form. Thus, "P" does not have (and cannot have) a component directed parallel to the rotation axis of the toroidal form.

In addition, the double arrow "P" indicates the direction of possible vertical movement of the support. None of the applied references discloses or suggests any concrete means to accomplish such movement in direction "P", let alone a means that allows a movement of the support in a plane parallel to the rotation axis of the toroidal form, with the movement having a component directed parallel to the rotation axis of the toroidal form, as recited in the present Claim 1. See paragraph [0085] of *Mayet '265*; paragraph [0047] of *Mayet '251*; and paragraph [0069] of *Mayet '736*. It should be noted that the adjustability mentioned in paragraphs [0073] and [0074] of *Mayet '265* refers to the capability of adjusting the distance between the first

auxiliary arm 3D^{2b} and the second auxiliary arm 32^{2b}. The adjustability does not refer to the movement of the support 30^{1a} relative to the toroidal form.

In contrast, amended Claim 1 recites a means that allows a movement of the support relative to the frame in a plane parallel to the rotation axis of the toroidal form, with the movement having a component directed parallel to the rotation axis of the toroidal form.

In view of these differences, withdrawal of the § 102(b) rejection of Claim 1 is respectfully requested.

Moreover, the fundamental differences discussed above between the present invention and *Mayet '265*, *Mayet '251* and/or *Mayet '736* render the invention clearly unobvious thereover, under 35 USC § 103(a).

Dependent Claims 2-8

Claims 2-8 depend, either directly or indirectly, from Claim 1 and, thus, each is allowable therewith.

In addition, Claims 2-8 include features that serve to even more clearly distinguish the present invention over the applied references.

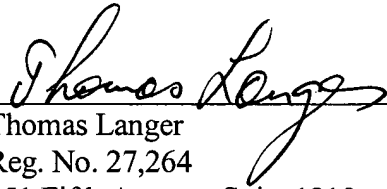
Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

Respectfully submitted,

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Dated: October 31, 2005